

1 Isabelle Ord, Cal. Bar No. 198224 (*pro hac vice admitted*)
E-mail: isabelle.ord@us.dlapiper.com
2 Andrew Serwin, Cal. Bar No. 179493 (*pro hac vice admitted*)
E-mail: andrew.serwin@us.dlapiper.com
3 Jeffrey DeGroot, WSBA No. 46839 (*pro hac vice admitted*)
E-mail: jeffrey.degroot@us.dlapiper.com
4 DLA PIPER LLP (US)
5 555 Mission Street
San Francisco, California 94105-2933
6 Tel: 415.836.2500
7 Fax: 415.836.5201

8 Jennifer K. Hostetler, SBN 11994
E-mail: jhostetler@lewisroca.com
9 LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Parkway, Suite 600
10 Las Vegas, Nevada 89169-5996
Tel: 702.474.2624
11

12 Attorneys for Defendants FARMERS GROUP, INC.,
FARMERS INSURANCE EXCHANGE, and
13 21st CENTURY INSURANCE COMPANY

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 RONALD STALLONE, on behalf of himself
17 and all other persons similarly situated,

18 Plaintiff,

19 v.

20 FARMERS GROUP, INC., a Nevada
Corporation; FARMERS INSURANCE
21 EXCHANGE; and TRUCK INSURANCE
EXCHANGE,
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23 Defendants.
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Case No. 2:21-cv-01659-GMN-VCF

**STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S
SECOND AMENDED COMPLAINT
(FIRST REQUEST)**

Defendants FARMERS GROUP, INC., FARMERS INSURANCE EXCHANGE, and 21st CENTURY INSURANCE COMPANY (collectively, “Defendants”) and Plaintiff RONALD STALLONE (“Plaintiff”) submit this stipulation and proposed order to extend Defendants’ deadline to file their response to Plaintiff’s Second Amended Complaint (“SAC”). This is the first request or stipulation to extend Defendants’ deadline to respond to the SAC.

1. Plaintiff filed his SAC on October 26, 2022. (ECF No. 58).

2. Defendants’ response to the SAC is currently due on November 9, 2022.

3. Given the putative class and other allegations contained in the SAC, Defendants require additional time to prepare and file a response.

4. The parties stipulate—in good faith, and not for purposes of delay—to extend the response deadline from November 9, 2022 to November 30, 2022.

5. This proposed schedule will permit Defendants sufficient time to investigate and properly respond to the factual allegations in the SAC and accounts for the upcoming Thanksgiving holiday.

6. For these reasons, the parties stipulate that Defendants’ response to the SAC shall be due on or before **November 30, 2022**.

IT IS SO STIPULATED.

DATED this 2nd day of November, 2022.

/s/ Jennifer K. Hostetler

Jennifer K. Hostetler, SBN 11994
E-mail: jhostetler@lewisroca.com
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169-5996
Tel: 702.474.2624

Isabelle Ord, Cal. Bar No. 198224
(*pro hac vice admitted*)
E-mail: isabelle.ord@us.dlapiper.com
Andrew Serwin, Cal. Bar No. 179493
(*pro hac vice admitted*)
E-mail: andrew.serwin@us.dlapiper.com
Jeffrey DeGroot, WSBA No. 46839
(*pro hac vice admitted*)
E-mail: jeffrey.degroot@us.dlapiper.com
DLA PIPER LLP (US)

/s/ Gayle M. Blatt

Michael Kind
Mk@kindlaw.com
Kind Law
8860 S. Maryland Parkway, Suite 106
Las Vegas, NV 89123
(702) 337-2322

Gayle M. Blatt* (CA 122048)
gmb@cglaw.com
CASEY GERRY SCHENK
FRANCAVILLA BLATT &
PENFIELD, LLP
110 Laurel Street
San Diego, CA 92101
Telephone: (619) 238-1811
Facsimile: (619) 544-9232

Kate M. Baxter-Kauf* (MN #0392037)

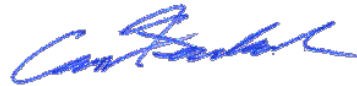
1 555 Mission Street
2 San Francisco, California 94105-2933
3 Tel: 415.836.2500
4 Fax: 415.836.5201

5 Attorneys for Defendants
6 FARMERS GROUP, INC., FARMERS
7 INSURANCE EXCHANGE, AND 21st
8 CENTURY INSURANCE COMPANY

Kmbaxter-kauf@locklaw.com
Karen Hanson Riebel* (MN #0219770)
khriebel@locklaw.com
Maureen Kane Berg* (MN #033344X)
mkberg@locklaw.com
LOCKRIDGE GRINDAL NAUEN
P.L.L.P.
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
(*admitted pro hac vice)

Attorneys for Plaintiff and the putative
Class

11 IT IS SO ORDERED.

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13 Cam Ferenbach
14 United States Magistrate Judge

15 DATED 11-7-2022
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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of November, 2022, I caused a true and accurate copy of the foregoing document **STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO RESPOND TO SECOND AMENDED COMPLAINT** to be filed with the Clerk of the Court via the CM/ECF system, which will send an electronic copy to all interested parties.

/s/ Dana K. Provost

An employee of Lewis Roca Rothgerber Christie LLP